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Admitted in PA and NJ

January 8, 2020

### VIA CM/ECF

Honorable Michael B. Kaplan, U.S.B.J.  
United States Bankruptcy Court  
District of New Jersey  
Clarkson S. Fisher U.S. Courthouse, 2nd Floor  
402 East State Street  
Trenton, New Jersey 08608

Re: In re Hollister Construction Services, LLC  
Case No. 19-27439 (MBK)

Dear Judge Kaplan:

This office represents Allglass Systems, LLC, which was a subcontractor of Hollister Construction Services. My client has a Construction Lien Claim on the Newark Warehouse project in the amount of \$10,077.

I write in opposition to the motion filed by Newark Warehouse Urban Renewal, LLC and Newark Warehouse Redevelopment Company, LLC (together, "Newark Warehouse") to confirm the applicability of the automatic stay to certain construction liens [ECF No. 740] (the "Motion").

As a threshold matter, Allglass joins the Debtor's January 6, 2020 objection to Newark Warehouse's application for an order shortening time with respect to the Motion [ECF No. 743]. I am scheduled to attend a pre-trial conference in the Montgomery County Court of Common Pleas tomorrow at 10:00 a.m. and cannot attend the hearing on the Motion that was just scheduled on short notice for tomorrow morning. Moreover, my client and the other subcontractors should be given a full and fair opportunity to review and respond to the Motion before any decision is made that would potentially discharge or affect the rights of lien claimants. Allglass is potentially prejudiced by a shortened time period.

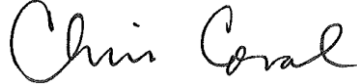
Substantively, with respect to the Motion, my understanding is that Newark Warehouse previously sought and obtained relief from the automatic stay that allowed the Newark Warehouse project and contract to be excluded from the bankruptcy estate. See Order dated October 11, 2019 [ECF No. 303]. Moreover, Debtor's counsel has not requested the removal of Allglass' lien on the Newark Warehouse project.

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In short, Allglass filed and has maintained its construction lien in good faith and under the belief that the automatic stay has been lifted with respect to this particular contract of the Debtor at the request of Newark Warehouse. My client, of course, will comply with this Court's Orders but respectfully requests that the Motion should be denied.

Very truly yours,

A handwritten signature in cursive script that reads "Chris Coval".

CHRISTOPHER P. COVAL

cc. All Counsel of Record via ECF